

**CHASE KURSHAN HERZFELD & RUBIN, LLC**

354 Eisenhower Parkway, Suite 1100  
Livingston, New Jersey 07039-1022  
(973) 535-8840  
Attorneys for Volkswagen AG and  
Volkswagen Group of America, Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

-----X  
JOHN M. DEWEY, et al.,

Plaintiffs,

Case Nos.: 07-CV-2249-FSH-PS  
07-CV-2361-FSH-PS  
(Consolidated)

-vs.-

VOLKSWAGEN AG, et al.,

Defendants.

-----X  
JACQUELINE DELGUERCIO, et al.

Plaintiffs,

**CERTIFICATION OF  
JEFFREY L. CHASE**

-vs.-

VOLKSWAGEN GROUP OF AMERICA, INC.,  
et. al.

Defendants.

-----X

I, Jeffrey L. Chase, of full age, hereby certify as follows:

1. I am a member of the law firm of Chase Kurshan Herzfeld & Rubin, LLC, attorneys for the defendants in the above-referenced action. As such, I am fully familiar with the facts and prior proceedings in this matter.

2. Attached as Exhibit "A" is a Certification of David Mazie filed in the Court Pacer System, in the *Beye v. Horizon* matter 2:06-CV-06219-FSH-PS together with

Exhibit "O" to the Certification. This Exhibit shows attorney hourly billing rates for the Mazie Slater firm in that action.

3. Attached as Exhibit "B" is information obtained from online concerning the Genova Burns law firm, local New Jersey counsel to the Schoengold Sporn law firm, which shows certain hourly fee rate information. It includes a Borough of Red Bank Resolution Authorizing Appointment of Labor Counsel, Cumberland County Contract Award and Borough of Harvey Cedars Resolution.

4. Attached as Exhibit "C" is the Report and CV of Defense expert economist Dr. Janusz Ordovery.

5. Attached as Exhibit "D" is a copy of the Report and CV of defense automotive expert Robert Lange.

6. Attached as Exhibit "E" is a copy of the Revised Final Fairness Hearing Order and Slip Opinion of the Honorable Stephen J. Burnstein in *Sutter v. Horizon*, Docket No.: ESX-L-3685-02.

/s/ Jeffrey L. Chase  
Jeffrey L. Chase

Dated: June 29, 2010